

EXHIBIT B

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[Additional counsel included below]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' SEVENTH SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANT META PLATFORMS, INC.**

1 In accordance with Federal Rules of Civil Procedure 26 and 34, and orders issued by the Court in
 2 this matter, Plaintiffs, by and through their undersigned attorneys, request that Meta produce for inspection
 3 and copying, by **March 19, 2025**, the documents and things described below, in accordance with the
 4 following definitions and instructions. Meta must produce documents and other things described below
 5 electronically or at the offices of Boies Schiller Flexner, LLP, 44 Montgomery St., 41st Fl., San Francisco,
 6 CA 94104.

7 **DEFINITIONS**

8 As used herein, the following words, terms, and phrases—whether singular or plural, or in an
 9 alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or
 10 made uppercase. The given definitions apply regardless of whether a term in question is capitalized or made
 11 uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase
 12 form:

13 1. “Any,” “or,” and “and”: “Any” should be understood to include and encompass “all”; “or”
 14 should be understood to include and encompass “and”; and “and” should be understood to include and
 15 encompass “or.”

16 2. “Data” means content, files, information, metadata, software, or any other digital material,
 17 including Documents.

18 3. “Document” is used in its broadest sense allowed by Federal Rule of Civil Procedure 34(a),
 19 and includes:

- 20 • All application logs, command-line history logs (including the .bash_history file in the user
 21 home directories of servers used for downloading data), download logs, data processing
 22 records, usage reports, server logs, network traffic reflecting torrent downloads or uploads
 23 (including during the leeching and seeding phases), and descriptor files; and
- 24 • All data acquired via torrent clients copied to any data storage solution such as local servers,
 25 virtual servers, cloud-based storage, including Amazon Web Services S3 synchronization
 26 logs, data integrity checks, and access control records.

4. “Including” and “includes” are used to provide examples of certain types of information and should not be construed as limiting a request or definition in any way. The terms “including” and “includes” shall be construed as if followed by the phrase “but not limited to.”

5. “Meta” and “Your” refers to Defendant Meta Platforms, Inc., including its employees, agents, attorneys, accountants, representatives, predecessors or successors-in-interest, any corporation or partnership under its direction or supervision, or any other person or entity acting on its behalf or under its control.

6. “Online Database(s)” means the type of databases described in paragraphs 43 and 44 of Plaintiffs’ Third Amended Consolidated Complaint, Dkt. No. 407, at p.8—online databases with copyrighted material or books including but not limited to Books3, b3g, Z-Library (aka B-ok), Library Genesis (aka LibGen), Bibliotik, Anna’s Archive, Internet Archive, DuXiu, and The Pile. The term encompasses all versions, updates, augmentations, or modifications of such databases, and the distribution, provision, or sharing of copyrighted material or books by other users, or peers, via the torrent protocol or network.

7. “Torrent Client(s)” means a network or application designed for sharing computer data that was used by Meta to obtain Data from any Online Database, including but not limited to BitTorrent and LibTorrent.

INSTRUCTIONS

1. The relevant date range for the Request for Production herein is January 1, 2022 to the present.

2. If You claim You are unable to produce a Document, you must state whether that inability is because the Document never existed; has been destroyed, lost, misplaced or stolen; or has never been or is no longer in your possession, custody or control. Such a statement must further set forth the name and address of any person or entity that you know or believe to have possession, custody or control of that item or category of item. If any Document responsive to a request has been destroyed, produce all documents describing or referencing: (1) the contents of the lost or destroyed document; (2) the locations in which any copy of the lost or destroyed Document had been maintained; (3) the date of any such loss or destruction to the extent known; (4) the name of each person who ordered, authorized and carried out the destruction of

1 any lost or destroyed Document; (5) all document retention and destruction policies in effect at the time any
2 requested Document was destroyed; and (6) all efforts made to locate any responsive Document that was
3 lost or destroyed.

4 3. If You object to any item or category of item, Your response shall (a) identify with
5 particularity each document or thing to which the objection is made and (b) set forth clearly the extent of,
6 and specific ground for, the objection; and You should respond to the Request to the extent it is not
7 objectionable.

8 4. If You object that a Document is covered by the attorney-client or other privilege, or is work-
9 product, You must provide a Privilege Log containing: (1) the name of the Document; (2) the name and
10 address of the person(s) who prepared it; (3) the person(s) to whom it was directed or circulated; (4) the date
11 on which the Document was prepared or transmitted; (5) the name and address of the person(s) now in
12 possession of the Document; (6) the description of the subject matter of the Document; (7) the filename or
13 pathname of the Document; and (8) the specific nature of the privilege claimed, including the reasons and
14 each and every fact supporting the withholding, and legal basis sufficient to determine whether the claim of
15 privilege is valid.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 137**

18 Documents sufficient to show the installation, usage, configuration, and operation of Torrent Clients
19 to obtain Data from Online Databases, including the filename, size, file creation time, and file last modified
20 date of the Data; configuration files or equivalent settings registries, bandwidth logs, work files, and support
21 tickets; and Amazon Web Services invoices relating to Your data usage, storage, or transfer.
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Dated: March 5, 2025

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

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